





Thursday, May 20, 2021

*memorandum*

to: Dr. Zubie Moorjani  
from: Deepak Moorjani

cc: Ashok Kulnarni  
cc: Gul Moorjani  
cc: Jas Moorjani  
cc: Jennifer Compton  
cc: Karen Denune  
cc: Lisa Stout  
cc: Lynn Balshone Jacobs  
cc: Manisha Moorjani  
cc: Martin Rowbottom  
✓ cc: Maureen Zdanowicz  
cc: Moti Moorjani  
cc: Pamela Salem O'Hagan  
cc: Rosemarie Osowik  
to: Seema (Kulkarni) Moorjani  
cc: Sue Stolar  
cc: Sueja Kummar  
cc: Suneel Kulkarni  
cc: Susan Rita Feierman Solomon  
cc: Tyler Chapman

*Hi Mom,*

*I forgive you for your poor behavior, and I love you unconditionally. I would like you to participate in your own rescue.*



Thursday, May 20, 2021

*memorandum*

To: Seema (Kulkarni) Moorjani  
From: Deepak Moorjani  
Subject: Notification of Elder Abuse

This memorandum is an official notification of Seema Moorjani and Sunil Moorjani's elder abuse. Seema Moorjani and Sunil Moorjani's failure to perform constitutes elder abuse, and their elder abuse will necessarily be punished.

- On January 09, 2019, I notified Seema Moorjani and Sunil Moorjani of the suicide red flag raised on January 08, 2019 by Jennifer Compton of Sun Federal. Unfortunately, Seema Moorjani and Sunil Moorjani chose to ignore the recommendations made in my notification.
- On December 20, 2019, I notified Seema Moorjani and Sunil Moorjani of The 10-Day Plan, and Seema Moorjani and Sunil Moorjani failed to implement this plan.

On May 11, 2021, I spoke with Jennifer Compton of Sun Federal. She was disconcerted by her recent visit to my mom's house, and Jennifer Compton confirmed my belief that my mom lacks the competence to manage her affairs. In addition to the issue of self-harm, Jennifer Compton indicated that it was possible for my mom to hurt herself and be unable to call for help. Jennifer Compton vocalized her belief that my mom might eventually be found dead by her neighbors.

My mom is currently giving me the silent treatment. While we were talking every day, my mom's silent treatment is her retaliation for raising the issues in my February 12, 2021 and March 14, 2021 letters to Seema Moorjani. Unfortunately, my mom angrily refuses to examine her behavior and to recognize that she is the common denominator in her life. However, I still call my mom every day.

On May 18, 2021, my mom meant to terminate my call, but she hit the wrong button. Therefore, I heard her conversation with her helper, and my mom stated, "I don't want to talk to him."

For verification purposes, I recorded the conversation, and the recording confirms these issues:

- My mom lacks the competence to make her own decisions: my mom asks her helper what she should do about her appointment, and my mom subsequently takes the helpers advice without question. My mom also plays the role of the helpless child: she subsequently asks the helper to call on her behalf, because she is unable to manage her affairs. (Note: My mom has never had the competence to make her own decisions, and this is a function of her low self-esteem.)
- My mom is tormented by her loneliness, and she repeatedly tries to manipulate her helper into staying longer. My mom is terrified of being alone: in the sound of her voice, one can hear my mom's desperation as she consistently tries to prevent the helper from leaving.

Sunil is still angry that he did not receive the love and attention that he wanted as a child, and his quest for external validation drives him to satisfy Seema's compulsive neediness. However, Sunil should realize that my mom's behavior has always been driven by her low self-esteem, and my mom does not love herself. She was unable to give Sunil what she does not have for herself.

*Thursday, May 20, 2021*

*Distribution List*

cc: Ashok Kulnarni  
cc: Gul Moorjani  
cc: Jas Moorjani  
cc: Jennifer Compton  
cc: Lisa Stout  
cc: Lynn Balshone Jacobs  
cc: Karen Denune  
cc: Manisha Moorjani  
cc: Martin Rowbottom  
cc: Maureen Zdanowicz  
cc: Moti Moorjani  
cc: Pamela Salem O'Hagan  
cc: Rosemarie Osowick  
cc: Sue Stolar  
cc: Suoeja Kummar  
cc: Suneel Kulkarni  
cc: Susan Rita Feierman Solomon  
cc: Tyler Chapman

"deepak"

May 22, 2021 5:02 PM

To: seemakulkarni@

Cc: moorjani@, ladybird\_7@, zubiemoorjani@, gulmoorjan

Reply-To: "deepak"

Mom's state of mind and her state of health

2 Attachments, 5.7 MB

Hi Seema,

The attached recordings demonstrate your mother-in-law's state of mind and her state of health. One was taken at 3:57pm PST, and the other was taken at 4:12pm PST.

--

Deepak Moorjani

**Confidentiality Notice:**

This e-mail message, including any attachments, is for the sole use of the intended recipient(s).

Any unauthorized review, use, disclosure or distribution of this information is prohibited.

If this was received in error, please (i) notify the sender by email and (ii) destroy all copies of the original message.



2021051815...m4a (5.1 MB)



2021051816...m4a (591 KB)



**CORPORATE OFFICES**

SOUTHWOOD J. MORCOTT  
CHAIRMAN, PRESIDENT AND  
CHIEF EXECUTIVE OFFICER

Zubeida Moorjani, MD  
500 Riverside Drive  
Rossford, OH 43460

Dear Dr. Moorjani:

Thank you very much for your letter regarding the St. John's High School news article on my thoughts about the Jesuit School.

I also appreciate you sending me the resume on your son, Deepak. He certainly looks like an outstanding young person. I would suggest that the next time he is in Toledo for the holidays, you ask him to give us a call, as we would be happy to chat with him about his career objectives and aspirations.

Thank you again for your note.

Sincerely,



Southwood J. Morcott

SJM/gc

cc: Carl Hirsch  
Deepak G. Moorjani



Leo J. Hindery, Jr.  
President and CEO

AT&T Broadband & Internet Services  
P.O. Box 5630  
Denver, CO 80217-5630  
Room 2-248  
9197 S. Peoria Street  
Englewood, CO 80112  
720 875-5500  
FAX 720 875-5394

Date: 12, 1999

Mr. Atsushi Nishijo  
Director  
General Manager  
Media Services  
Sumitomo Corporation  
Sumisho Kanda Building  
3-24-4, Kandanishikicho, Chiyoda-ku  
Tokyo, 101 Japan

Dear Nishi-san:

It was a pleasure to spend time with you on Saturday, and I am glad we could get together. I cherish your friendship and our relationship, and I hope that we can arrange to get together in Japan soon. If we cannot, I will look forward to seeing you in Los Angeles during the Western Cable Show.

One thing I neglected to mention when we were together is Sumitomo's consideration of a possible investment in a startup internet venture fund, Genesis, which your New York office is considering on your behalf. For what it is worth, I think very highly of the Fund Manager, Deepak Moorjani, and I will be investing, on a personal basis, \$500,000 into Genesis.

All my best. I look forward to seeing you soon.

Kind personal regards,

LJH/lp



INTERMEDIA PARTNERS

10/19/99 TUE 07:56 FAX 415 397 3978



Mr. Lionel Pincus  
Warburg Pincus  
466 Lexington Avenue  
New York, New York 10017

Dear Lionel:

Deepak Moorjani, a very talented former colleague of mine with extensive venture capital experience, is giving serious consideration to [redacted] and knowing your extensive investments there I thought you would be interested in talking to him. I believe he made an effort at some point to get in touch with your firm but without much success. I can assure you whatever the outcome it will not be a waste of your time as he is a very talented young man.

I hope this finds you well and that our paths will cross in more than a casual way in the New Year.

Sincerely,

Robert S Pirie

Enclosure

52 West 9<sup>th</sup> Street, New York, NY 10011





# ROBBINS RESEARCH INTERNATIONAL, INC.

***Sunil G Moorjani***

*National Account Representative*

*(303) 796-7909*

*(619) 535-9900*

*1-800-445-8183, Ext. 6523*

*Fax (619) 535-6301*

*9191 Towne Centre Drive*

*Suite 600*

*San Diego, CA 92122*

## The Opportunity Questions

1. What am I most **excited** about today?
2. How can I go the “**extra mile**” for someone today?
3. What am I **reading** or **listening** to today that will enlighten me?
4. How can I **exercise** today to create greater energy?
5. Do I want to ignore these questions and suffer the consequences later?



*spirit of love*

*s e p t e m b e r 1 , 2 0 0 1*

1. When you say nothing at all (Alison Kraus)
2. Hope you Dance (Leanne Womack)
3. The Promise (When in Rome)
4. Just to hear you say that you love me (Faith Hill & Tim McGraw)
5. LOVE (Nat King Cole)
6. Always on my mind (Pet shop boys)
7. Groovy Kind of Love (Phil Collins)
8. Unchained Melody (Righteous Brothers)
9. I'm a believer (Smashmouth)
10. (I've had) the time of my life (Bill Medley & Jennifer Warrens)
11. Just can't get enough (Depeche Mode)
12. Can't help falling in love (Elvis Presley)
13. Crazy for you (Madonna)
14. I'm gonna be (500 miles) (Proclaimers)
15. Stand by me (Ben E King)
16. That's amoré (Dean Martin)





SUNIL & SEEMA MOORJANI

(TOGETHER WITH THE MOORJANI & KULKARNI FAMILIES)

*request the pleasure of your company  
on the occasion of the  
"Upanayanam"  
of their sons*

ASHAY & DEVIN



*Saturday, November 21, 2015 at 9:30am  
Hotel Shreyas Banquet Hall  
1242 B, Apte Road, Deccan Gymkhana  
Pune, Maharashtra 411004*



BEST WISHES ONLY PLEASE





Jennifer Compton <jennifer.compton@sunfcu.org>  
Resent-From  
To: "Deepa"  
RE: Adult Protection Services

May 27, 2021 5:38 AM

---

I'm hoping for the best for your mom.

**Jennifer Compton**  
*SEG Relationship Manager (NMLS #809440)*  
Phone: 419.794.7482  
Fax: 419.893.5071



1627 Holland Road | Maumee, OH 43537-1622 | 800.786.0945

Follow Sun Federal:



---

**From:** Deepa  
**Sent:** Wednesday, May 26, 2021 7:07 PM  
**To:** Jennifer Compton <Jennifer.Compton@sunfcu.org>  
**Subject:** Adult Protection Services

---

Hi Jennifer,

I spoke with Adult Protection Services in Lucas County, and I gave your name as one of the references. Here are the issues that they might consider:

- an inability to handle personal finances
- exploitation: my mom's inability to live in her house in San Diego, because Sunil and his wife (Seema) will not allow her
- recent hospitalization: last month's broken pelvis
- previous interventions: the Jan 08, 2019 suicide red flag that you correctly raised (but was ignored by most).

Have a great weekend.

Deepak

This email and any files transmitted with it are the property of Sun Federal Credit Union, are confidential, and are intended solely for the use of the individual or entity to which this e-mail is addressed. If you are not one of the named recipient(s) or otherwise have reason to believe that you have received this message in error, please notify the sender and delete this message immediately from your computer. Any other use, retention, dissemination, forwarding, printing, or copying of this email is strictly prohibited. Any opinions expressed are those of the sender and do not necessarily represent those of Sun Federal Credit Union.

Warning: Computer viruses can be transmitted via email. Although the credit union has taken reasonable precautions to ensure no viruses are present in this email, the credit union cannot accept responsibility for any loss or damage arising from the use of this email or attachments.

*a memo from the desk of*  
*Deepak Moorjani*

Friday, November 19, 2021

Adult Protective Services  
Health and Human Services Agency  
County of San Diego  
1600 Pacific Hwy, #206  
San Diego, CA 92101

to: Adult Protective Services

subject: Zubeida Moorjani, MD

Today, I called 800.339.2021 to open an investigation, and I spoke with Pam about Zubeida Moorjani, my mother. She is an elder person who is a retired medical doctor.

On May 25, 2021, I called APS and spoke with Tiffany. At the time, my mom was living at her house in Toledo, Ohio; therefore, I was unable to file a report in San Diego. On May 25, 2021, I filed a report in Lucas County, Ohio for (i) neglect and abandonment and (ii) financial abuse.

My mom is an elder with the following issues

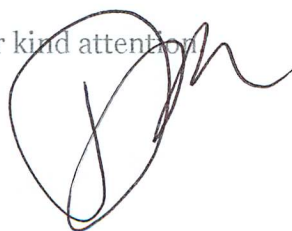
- A medical condition (e.g. high blood pressure)
- A recent hospitalization (e.g. broken pelvis)
- A person who is unable to manager her finances (e.g. pay her bills, balance her checkbook).
- A person who has had previous interventions (e.g. attached Suicide Red Flag).

These issues are described in the attached First Amended Complaint; this has been filed as a part of San Diego Superior Court Case No. 37-2021-00033119-CU-OR-CTL.

In San Diego, her contacts are

1. John Alessio. 525 B Street, Suite 2200, San Diego, CA 92101. (619) 238-1900.  
john.alessio@procopio.com
2. Seema Moorjani. \_\_\_\_\_  
m
3. Sunil Moorjani. \_\_\_\_\_

Thank you for your kind attention.



Deepak Moorjani /

*a memo from the desk of*  
**Deepak Moorjani**

Wednesday, December 8, 2021

Adult Protective Services  
Health and Human Services Agency  
County of San Diego  
1600 Pacific Hwy #206  
San Diego, CA 92101

to: Adult Protective Services  
subject: Zubeida Moorjani, MD  
San Diego Superior Court Case No. 37-2021-00033119-CU-OR-CTL

On November 19, 2021, I called Adult Protective Services ("APS") in San Diego to request an investigation on the elder abuse of Zubeida Moorjani. My mother is an elder person who is a retired medical doctor.

On November 19, 2021, I spoke with Pam (intake) at 800.399.2021. Based on our conversation, Pam believed that an investigation would commence based on (i) emotional abuse and (ii) financial abuse. On November 19, 2021, I mailed written information to APS in San Diego, and this letter provides additional information.

***Adult Protective Services: San Diego and Lucas County***

On May 25, 2021, I contacted APS in San Diego. My desired outcome was to move my mother from her house in Lucas County, Ohio to her house in San Diego County, California.

On May 25, 2021, I spoke with Tiffany of APS in San Diego, and she provided guidance on the issues that APS considers in its investigations.

My mom is an elder with the following issues

- A medical condition (e.g. high blood pressure)
- A recent hospitalization (e.g. broken pelvis)
- A person who is unable to manage her finances (e.g. pay her bills, balance her checkbook).
- A person who has had previous interventions (e.g. Notification: Suicide Risk on January 10, 2019).

At the time, my mother was living in Lucas County, Ohio; therefore, Tiffany with APS in San Diego suggested that I contact APS in Lucas County, Ohio.

On May 25, 2021, I filed a report with Colleen of APS in Lucas County, Ohio for (i) neglect and abandonment and (ii) financial abuse.

These issues are described in the First Amended Complaint filed in San Diego Superior Court Case No. 37-2021-00033119-CU-OR-CTL. The First Amended Complaint is item #14 in the Register of Actions, and the First Amended Complaint contains information and exhibits which may assist APS of San Diego's investigation.

**Personal Contacts in San Diego County**

In San Diego, Zubeida Moorjani's contacts are

1. John Alessio. c/o Procopio, Cory, Hargreaves & Savitch, LLP. 525 B Street, Suite 2200, San Diego, CA 92101. (619) 238-1900. john.alessio@procopio.com
2. Manisha Moorjani. c/o Gossamer Bio. 3013 Science Park Road, Suite 200, San Diego CA 92121. (858) 684-1300. ~~Manisha.Moorjani@gossamerbio.com~~
3. Seema Moorjani. 11881 Cypress Valley Drive, San Diego, CA 92131. ~~Seema.Moorjani@seemamoorjani.com~~
4. Sunil Moorjani. 11881 Cypress Valley Drive, San Diego, CA 92131-3762. ~~Sunil.Moorjani@seemamoorjani.com~~

**John Alessio (Bar No. 174900), Procopio, Cory, Hargreaves & Savitch, LLP**

Additionally, I would like APS of San Diego to investigate John Alessio (Bar No. 174900) for elder abuse. As a member of the California bar, John Alessio is currently the managing partner of Procopio, Cory, Hargreaves & Savitch, LLP ("Procopio").

John Alessio and Sunil Moorjani are former classmates at the University of San Diego Law School ('94), and John Alessio may have allowed a personal relationship to compromise his legal judgment. As a member of the California bar, John Alessio should have recognized the conflict of interest, and he should have declined to represent the defendants.

The attached Notification: Suicide Risk is dated January 10, 2019, and this letter was sent via certified mail to Rosemarie Osowik, MD with a cc: to Jennifer Compton of Sun Federal, Louise Jackson of Eastman & Smith, and Sunil Moorjani. Additional, this letter was sent via certified mail to Thomas Osowik, a judge in the Ohio Sixth District Court of Appeals.

Despite the filing of the First Amended Complaint, John Alessio and Procopio have still failed to recuse themselves; consequently, I filed a Notice of Motion and Motion to Disqualify, a Memorandum of Points and Authority, and a Declaration of Plaintiff. The San Diego Superior Court Case No. 37-2021-00033119-CU-OR-CTL is being heard in C-65 by Honorable Ronald F. Frazier.

In the Motion to Disqualify, John Alessio and Procopio's emails have been produced, and John Alessio and Procopio's emails show that they have consistently sought to force a dismissal with prejudice. However, John Alessio has client relationships with Gulab Moorjani, Seema Moorjani, Sunil Moorjani and Zubeida Moorjani.

In his November 30, 2021 email (attached), one of John Alessio's junior associates admits that the First Amended Complaint has been filed; however, the junior associate (Zagros Bassirian, Bar No. 299581) is actively soliciting a settlement proposal.

Note: The First Amended Complaint was served to the defendants directly via USPS certified mail. USPS tracking information (#70163010000034555499) shows: (i) on November 22, 2021 at 8:48am, the package was "Held at Post Office, At Customer Request," (ii) on November 26, 2021 at 12:11pm, the package was not delivered but "Notice Left (No Authorized Recipient Available)", and (iii) on November 27, 2021, the package was not delivered but "The customer has requested that the Postal Service redeliver this item on November 29, 2021 in SAN DIEGO, CA 92131."

Thank you for your kind attention.

cc: Brigid Heid, Eastman & Smith  
cc: Lynn Balshone Jacobs  
cc: Manisha Moorjani, Gossamer Bio  
cc: Soueja Kummar, S.K. Financial, LLC

.....



Deepak Moorjani <deepak@moorjani.com>  
To: zubie moorjani <zubie@moorjani.com>  
Cc: sunil\_moorjani@moorjani.com  
Re: Situation update

January 3, 2004 12:14 PM

Hi Mom,

As we discussed, here are my thoughts on the situation.

The bank will force you and Dad into foreclosure if you don't find a negotiated/friendly settlement. While I have not received Dad's "letter," I imagine that it will be mostly finger-pointing without any real thoughts about finding a solution.

He sees you as the enemy, because "you left him." He sees Tony and I as protecting your interests at his expense. Funny, because we're actually trying to help him (see note below). He remains unwilling to deal with reality.

I am withdrawing from this situation, because I think that it is impossible to help someone who doesn't want to help himself. My suggestions to you:

1. Get your son (Sunil) involved. He should call Dad every day and try to get him to act responsibly. Dad needs to separate the marriage situation from the financial situation as much as possible. I've said this to him, since day 1. Together, you need to fight the bank. He continues to behave selfishly.
2. Moti needs to get involved. I have tried to have Tulsi and Jas call Moti to get him involved. It seems that he is the only one who can help to sway Dad's view, as Dad ignores Tulsi and Jas on this matter. Jas was going to call him but decided against it. Jas means well, but he isn't too bright. He asked me to take a second loan on my place and make up the shortfall. He also thinks that the house is potentially worth \$3-4mm.

The bank wants a final settlement (and the deeds) by Jan 15, 2004. Time is not on your side.

On Dec 28, 2003, at 9:57 PM, deepak@moorjani.com wrote:

Thank you for the update. Hopefully, you have recovered from the flu and your blood pressure is under control. Here is an update.

Mom's blood pressure has elevated to 185-190/100, and she is on medication. She is remaining involved in order to help with the situation. When we met with Skybank, the senior banker (Kenneth Nagel, Executive Vice President) indicated that he would take a harsh position, if necessary. These bankers have a fiduciary obligation to protect the interests of their shareholders, and they will go to court without any hesitation. They have a business to run, but they indicated that they would work with us, if possible. This is their first alternative, but it is not their only alternative.

The bank is willing to work towards a negotiated solution, and this requires that you and Mom be involved as the joint signatories on the loans. If you are not involved (directly or indirectly), then the bank will pursue its claims in the court system. This will lead to a negative situation for each of you, as each will have to engage a bankruptcy lawyer, file bankruptcy, and give up most of your possessions (and possibly some portion of future earnings). This bankruptcy will also hinder your ability to do simple things, like subscribe to cell-phone service, rent an apartment, get a credit card, etc.

If you don't engage, then I imagine that the situation will get very bad, very quickly. No one wins in litigation except the lawyers, and I recommend that you try to avoid this. From an obligation standpoint, the fact that you have vacated the house and moved to Florida does not change the situation.

From a timing perspective, we are somewhat lucky to be in the holiday season, but I think you need to re-evaluate your position and get involved quickly. I am willing to help but am unable to do anything without your empowerment. As Uncle Jas has told you, I will be out of the country (in India) starting on Jan 7 and will be gone for most of the month.

The urgency of the situation requires that you and Mom (and me, to the extent that you decide) agree on a strategy for working with the bank. This is to reduce the negative potential of the situation. In my previous email, I have indicated the possible options, my recommendations and my request for your concurrence. If you want me to help, I am ready and willing, but I am constrained by travel schedules and the lack of signature authority.

Love,  
Deepak

On Dec 22, 2003, at 8:11 AM, gul@moorjani.com wrote:

At present I am on high blood pressure medicine and doctors (more than 164/100) has advised me not to get involved in anything which can cause increase in blood pressure.

Also, I do not have telephone at my apartment and I have to use someone else's or local library's computer to get my e-mail, which can take days.

I am due to see doctor on 23rd and will find out about my blood pressure. At present, I do not want to get involved with this house situation.

Gul

On Fri, 19 Dec 2003 10:53:04 -0800, deepak@moorjani.com wrote:

Begin forwarded message:

From: deepak@moorjani.com  
Date: November 30, 2003 2:13:13 PM PST

To: gul@...  
Subject: Situation update

Dear Dad,

I hope that you had a great Thanksgiving holiday. I went to Toledo to visit, and we spent the day with the Joseph family.

On 11/26/03, Tony Pizza and I had the chance to meet with Skybank to discuss possible solutions. In attendance were Chuck Parcher (Senior Vice President, Commercial Loans), Kenneth Nagel (Executive Vice President and Senior Credit Officer) and Felix Melchor (Vice President, Special Assets). Of this group, Kenneth is the senior member and the ultimate decision-maker. Felix is the point man, and Chuck is tangentially involved.

Before I begin, I think it's important for you to realize that there isn't any hidden agenda - we are simply trying to be helpful, and it is probably best that a third-party (in this case, Tony and I) negotiate on behalf of you and Mom. If you've gotten the impression that we're taking sides, then I apologize for my failure in this regard. Personally, I have nothing to gain or lose, and neither does Tony. In reality, you have the most to lose in this situation, because your assets are not in a pension fund and are not protected - which means that these assets are subject to seizure by the bank. In effect, we are actually working to help you more than anyone else.

Let's put it another way. You and Mom owe \$1.2mm to the bank, and whether it is a mortgage, home equity line, or personal loan, the bank can pursue its claims if there is a shortfall. The liability is joint and several - which means that the bank can pursue its claims with you, Mom, or both. Also, it can be a friendly negotiation, or the dispute can go to court where the bank can get a "deficiency judgment." Looking at the assets, the bankers imagine that they will take possession of the house and something else - the Buck Road land is at the top of the list. It's free and clear of liens, and there isn't a mortgage attached to it. Mom's assets are mostly in the form of pension funds, and legally, the bank is unable to seize these assets (even in court). If you had a pension, then this would hold true for you as well.

The bank is willing to value the house at \$800k, and in their minds, there is a \$400k deficiency. While they are nice people, they do have a fiduciary responsibility to make any deficiency as small as possible, and as a result, they want something in addition to the house. If there is something available, then Skybank has an obligation to pursue it. This is why the land comes into play. In the end, there will likely be some movement in the numbers, and the bank will probably agree to a number that is less than \$1.2mm. We have two choices, and I'd like to know your preference.

1. We offer the bank the house and the Buck Road land. This is not an attractive option, but they will probably accept this immediately.
2. We offer the bank the house and some cash (probably \$50-100k). In this case, we keep the Buck Road land. I'm not sure if this cash amount will have to be paid immediately or if they will take a note (perhaps a lien on the Buck Road land that is payable when it is sold). This is not a great outcome for the bank, and it might take some negotiation to get them to accept this offer.

Personally, I think the second option is the way we should proceed. The bank has done an initial check on the Buck Road land and have been told that it is probably worth \$190k (it's assessed Wood County value). As raw land, the absorption period is probably 12-18 months (meaning that it will take 12-18 months to sell it).

The question for you: How much do you want the land?

One thing to consider: in either scenario, the bank will forego interest payments until the property or properties are sold, and Skybank will assume the risk of selling and the associated costs (brokerage fees).

As an administrative item, I need to get a readable copy of the Pamela Rose agreement in order to understand any liabilities (brokerage fees) that might be generated by a bank transaction. The copy that you sent via email is not readable. Please fax to me at 309-404-8407. I think that it is also wise that you not allow (to the extent that you speak with either party) the auction/real estate company and the bank to speak to each other. This is to prevent any brokerage fee claim that

might be created.

Talk to you,  
Deepak

Richard G. Josep  
To: Deepak Moorjani  
Update

---

March 20, 2010 6:51 PM

Deepak, Hope all is well with you.

I took your mom to Flower Hospital (NOT St. Anne's) at her doctor's request. She's OK. Her doctor called me tonight around 7 and asked if I would do this.

Apparently, your mom saw the doc at 2 p.m. and then called her around 6 p.m. to say she was getting a headache. The doctor thinks she needs to be evaluated for many reasons, some of them psychological. She seems obsessed with her health, and her docs are growing impatient with her. Dr. Osowik, when she called tonight, was lovely and very determined to get to the bottom of all this. Flower Hospital, she said, has many more services than St. Anne's and that's why she wants her there.

Mom is in Room 517, two very nice nurses greeted us at the door to her lovely private room. Hospital No. is 419 824 1444.

I left two bowls of dry cat food and water for Tigger. He should be OK for two days or until you return on Monday.

Please stay in touch.

Love,

Mrs. J

9:47 p.m. Saturday



Sunil Moorjani <moorjani@gmx.com>

August 10, 2016 6:48 PM

Ti

I think about you everyday

---

Hi lil bro,

Just wanted to know that even though we haven't spoken in such a long time, I think you about you everyday.

In the morning and in the evening, I include you in my prayers. I hope that you are healthy, happy and enjoying life to the fullest.

There are constant reminders of you in my daily life.

When I go to the Del Mar beach, I think of the countless of times we would go the beach. We would lay there for hours in the sun.

When I take my kids to martial arts lessons, I remember biking 8-10 miles to my own martial arts class because you were living with me one summer and you needed the car to drive to a class at UCSD.

I remember practicing tennis with you on the courts of Rossford and later, Shadow Valley. We played 9th doubles for the JV team at St. John's.

I remember you reading more books than me at the Rossford Public Library for the Summer Reading Program.

Too many memories to list.

Please let me know how you are doing.

I miss you and would love to reconnect.

Love,  
S

**TABLE 3**

**SANCTIONS ISSUED IN 2006 BY THE SUPREME COURT OF OHIO  
PURSUANT TO CASES FILED BY DISCIPLINARY COUNSEL**

Name of Respondent and Supreme Court Case Number

**PUBLIC REPRIMANDS — 5**

Richard Van Agopian 2006-0779  
David Lee Engler 2006-0392  
Frank David Jacobs 2005-2395  
Jeffery Lynn Runyan (Judge) 2005-1183  
Robert Alphonso Taft II 2006-1561

**SIX MONTH SUSPENSIONS — 4**

Howard Joel Freedman 2006-0067  
John James Rooney 2006-0809  
Jerry Chad Stollings 2006-1146  
Terry Lynn Stranke 2006-0731

**ONE YEAR SUSPENSIONS — 4**

Paul Gregory Croushore 2005-1545  
Charles Eric Curry 2006-1178  
Thomas Lee Geer 2006-1177  
George Bernard Quatman 2005-1531

**EIGHTEEN MONTH SUSPENSIONS — 0**

< none >

**TWO YEAR SUSPENSIONS — 8**

Jerry Edwin Ault 2006-0441  
Kevin Arthur Bowman 2006-0444  
Larry Wendall Keller 2006-0437  
Jennifer A. Krieger (f k a. Hughes) 2005-1156  
Thomas Joel Manning 2006-0738  
Lawrence John Novak 2006-0080  
William Kerr Shaw, Jr. 2006-0066  
Mary Lou Wolf 2006-0737

**INDEFINITE SUSPENSIONS — 7**

Christopher Thomas Carlson 2006-1187  
Eileen Brubeck Hiltbrand 2006-0774  
David Harold Landon 2005-1196  
John Albert Lord 2006-0463  
Daniel Edward McKenna 2005-1546  
Lawrence John Novak 2006-1622  
David Michael Wise 2005-1182

**INTERIM REMEDIAL SUSPENSIONS — 0**

<none>

PS I would love to see you at X-mas  
I am allowed one free guest for 1 wk  
mom

My dear Dee

Hope you are well and Busy.  
So you know, I am going to San Diego on Dec 1st  
for four months, to the warm weather.

I am sorry, you have not  
responded to any communication from me over  
the years. Your silence breaks my heart.

You and I have at least one  
thing in common. We are not perfect. "Life itself  
is imperfectly perfect" - WABI SABI.

Both of us have made mistakes. I deeply  
regret for mine. We cannot change the past, but  
definitely, we can be proactive in future. I am  
sorry I hurt you, Dee.

I am 81 years old. As I get older, the  
challenges I face seem harder. I am trying my best.

The condo belongs to you. Perhaps, if you  
try to sell it, you will get more out of it than I will.  
I was planning on putting it for sale Spring 2018  
However I do not know where to send your belongings  
when the condo is sold. Please, please, your response  
will be appreciated deeply.

I love you Dee and think of you  
whereabouts all the time. I am your "mom"

I would love it, if you would even  
E-mail me.

God Bless you and keep you safe and  
healthy.

With much Love, Mom

My address  
Paradise Village, 2760 E 4th St, Apt 410 National City, CA 91951

Resent-From:

Zubieda G. Moorjani

---

Deepak: We have communicated before. I am your mother's attorney. Zubie recently signed updated core estate planning documents including a last will and testament and a self-trusteed revocable trust. Basically, you are a substantially equal beneficiary with your brother, Sunil. However, your mother does not have a location or any other contact information for you, including a phone number.

I am asking you to provide me with a physical address for you (and a phone number, if you are willing to do so) so that I can contact you as needed. If something happens to your mother (and may that be many years from now), I will need to communicate with you in order that you will be a meaningful beneficiary and so that the trust can make the appropriate distributions to you.

I am asking for your cooperation and I hope you will do so.

---

**EASTMAN & SMITH LTD.**  
ATTORNEYS AT LAW

*Established 1844 - Innovating Daily*  
Columbus - Detroit - Findlay - Toledo

Cindy D. Briggs  
*Legal Secretary*  
One Seagate 24th Floor  
P.O. Box 10032  
Toledo, Ohio 43699-0032  
419.247.1719 / Fax 419.247.1777  
[cdbriggs@eastmansmith.com](mailto:cdbriggs@eastmansmith.com)  
[www.eastmansmith.com](http://www.eastmansmith.com)

CONFIDENTIALITY NOTICE: This transmission is intended only for the addressee shown above. It may contain information that is privileged, confidential, or otherwise protected from disclosure. If you are not the intended recipient, please do not read, copy, or use it, and do not disclose it to others. Please notify the sender of the delivery error by replying to this message and then delete it from your system. Thank you.

If you send e-mail to Eastman & Smith, LTD in connection with a matter for which we do not already represent you, your communication may not be treated as privileged, confidential or otherwise protected because you are not a client. If you communicate with us by e-mail in connection with a matter for which we already represent you, please remember that Internet e-mail may not be secure.

Sunil Moorja  
Resent-From  
To  
Happy New Year lil bro

January 2, 2019 4:21 PM

---

Happy New Year D,

I got your voicemail messages and your letters. Congrats on all your professional success. That's an incredible honor to be selected. And I had no idea that you knew Michael Spindler - I'm sorry to hear about his passing.

Mom wanted me to convey that she was touched by your letters and emails. She has always been proud of your accomplishments. She is very happy that you two have reconnected.

I'm on board to work with you to help Mom relocate to San Diego on a full-time basis and to sell her condo.

Email is the best way for me to keep in touch. I'm not the best at returning calls or texting.

Peace!  
S



(419) 320-7036



Hi Deepak I'm here with your mom and I'm really worried about her.. she is walking in circles and shaking and talking about things I can't understand .. I m asking you should I contact someone to come out and check her she is not doing good ... I dont know to help her medically

(419) 320-7036 • Jan 8, 2019



Type a message





***Notification: Suicide Risk***

Via Certified Mail

Rosemarie Osowik, MD  
4041 Sylvania Ave., Suite 204  
Toledo, Ohio 43623

Dear Rosemarie,

On January 08, 2019, Jennifer Compton of Sun Federal visited Mom at 6036 Quarry's Edge Lane, and Mom stated, "I should just commit suicide."

The possibility of suicide should never be underestimated, and this is a direct cry for help. In Jennifer Compton's opinion, "She cannot stay in Toledo."

The working plan is for Mom to stay at her house in San Diego at 11881 Cypress Valley Drive, San Diego, CA 92131. During this two-month period, we will work on a longer-term plan, since Mom cannot live alone. She is lonely and depressed, and she is not able to make her own decisions. Most likely, Mom should move to an assisted-living facility, preferably in San Diego.

Jennifer Compton is director of business development at Sun Federal Credit Union, and she has advised my Mom on her financial affairs for approximately two decades. She is cc'd to this letter, and her phone number is 419.794.7482. She may contact you directly.

Sincerely yours,

*Deepak*

Deepak Moorjani

cc:

Jennifer Compton, Sun Federal Credit Union  
Louise A. Jackson, Eastman & Smith  
Sunil Moorjani

NOTIFICATION: SUICIDE RISK

Jennifer Compton <jennifer.compton@sunfcu.org>

February 1, 2019 5:15 AM

Resent-From:

To: "moorjani@gmx.com" <moorjani@gmx.com>

Cc: "Deepal

Your Mom

---

Hi Sunil,

I just wanted to give you a little bit of information regarding your mom. I visited her a few weeks ago to help with her bills and checking account. She was not doing good that day. She was very upset and extremely anxious. She couldn't remember if she had taken her medicine. She was very shaky. She was really mad at herself that she left California and thought it was a big mistake.

She stated that she is not doing good and thought she should "just commit suicide". I told her that I was extremely worried about her and that I was going to call 911. She really got upset and made me promise that I wouldn't call 911. When I got back to the office I contacted Deepak because I didn't know who else to contact and I would never forgive myself if something happened to her.

She really shouldn't be driving and being by herself seems very hard for her.

If you would like to talk please feel free to contact me.

Thanks and have a good weekend.

**Jennifer Compton**

*Director of Business Development (NMLS #809440)*

Phone: 419.794.7482

Fax: 419.893.5071



1627 Holland Road | Maumee, OH 43537-1622 | 800.786.0945

Follow Sun Federal:



This email and any files transmitted with it are the property of Sun Federal Credit Union, are confidential, and are intended solely for the use of the individual or entity to which this e-mail is addressed. If you are not one of the named recipient(s) or otherwise have reason to believe that you have received this message in error, please notify the sender and delete this message immediately from your computer. Any other use, retention, dissemination, forwarding, printing, or copying of this email is strictly prohibited. Any opinions expressed are those of the sender and do not necessarily represent those of Sun Federal Credit Union.

Warning: Computer viruses can be transmitted via email. Although the credit union has taken reasonable precautions to ensure no viruses are present in this email, the credit union cannot accept responsibility for any loss or damage arising from the use of this email or attachments.



# Wright & Supple LLP

660 Key Route Blvd. Albany, CA 94706  
 Mary (650) 248-6490 | Oriet (510) 495-5749  
[mary@wrightandsupple.com](mailto:mary@wrightandsupple.com) | [oriet@wrightandsupple.com](mailto:oriet@wrightandsupple.com)

INVOICE

**Deepak Moorjani**

**Invoice Date** November 10, 2021

**Invoice Number** 10001

**Invoice Amount** \$4,500.00

**Matter:** 1082-200 (Family Dispute)

## ATTORNEY'S FEES

10/11/2021	Review complaint and client's end goals memo in preparation to discuss with opposing counsel (0.7); call with opposing counsel to further discuss (0.5); email to the client re same (0.1); call with J. Belote to discuss co-counsel to advise on the factual and legal basis of the claims (0.1)	2.0	1.00	\$500.00
10/12/2021	Call with the client to discuss strategy moving forward (0.5); amending the complaint to address fatal deficiencies and plead valid claims to leverage for mediation and recommendation to hire J. Belote for representation in real estate claims (0.5); call with J. Belote to further discuss and set up a call with the client and J. Belote (0.1; no charge; call with J Belote and the client to further discuss (0.5); a follow up call with J. Belote to discuss initial analysis of type of claims that can be pleaded (0.2); follow up call with the client to discuss engaging elder abuse attorney to amend the complaint (0.2)	2.0	1.00	\$500.00

## Jim Maser

---

**From:** profferg <profferg@aol.com>  
**Sent:** Wednesday, October 13, 2021 11:15 PM  
**To:** Jim Maser  
**Subject:** Re: referral

Hi Jim. It's great to hear from you, as always. It would be great to see you again. We're leaving 10/20 for 3 weeks in Italy, but will be back 11/12--so anytime after that.

Re: your friends: the first thing to do is to report the situation to Adult Protective Services in the County in which the parents live. Here are the links for Alameda and Contra Costa Counties, respectively:

<https://www.alamedacountysocialservices.org/our-services/Abuse-and-Protection/adult-and-senior-abuse/index>

<https://www.contracosta.ca.gov/914/Adult-Protective-Services>

Re an attorney to help: I'd suggest you contact Kathryn Korn in Orinda. Here's the link to her website:

<https://www.kornlawgroup.com/>

I hope this helps. Let me know if you have other questions.

Warmest regards, Mike

-----Original Message-----

From: Jim Maser <Jim.Maser@picanteberkeley.com>  
To: profferg <profferg@aol.com>  
Sent: Wed, Oct 13, 2021 6:28 am  
Subject: referral

Hey Mike,


Hope all is well with you and your family.

I am beginning to remodel Picante today. Not sure how all this will roll out.

Do you have a referral for a lawyer who specializes in elder care abuse?  
Parents I know have kids who are bad actors, and they need help.

Thanks, and I hope it's sooner than later that I see you again.

Best,  
Jim

Oriet Cohen-Supple <oriet@wrightandsupple.com>   
Resent-From:  
To:  
Cc: Mary Wright <mary@wrightandsupple.com>  
FW: Moorjani matter -- a follow up question for you ...

October 13, 2021 9:00 AM

2 Attachments, 9 KB

---

**From:** Oriet Cohen-Supple  
**Sent:** Wednesday, October 13, 2021 8:59 AM  
**To:** Bassirian, Zagros S. <zag.bassirian@procopio.com>  
**Cc:** Mary Wright <mary@wrightandsupple.com>  
**Subject:** RE: Moorjani matter -- a follow up question for you ...

It's critical info if your clients wish to resolve this case amicably. We will give your client additional time to re consider their position. And I will reach out early next week to further discuss.

---

**From:** Bassirian, Zagros S. <zag.bassirian@procopio.com>  
**Sent:** Wednesday, October 13, 2021 8:57 AM  
**To:** Oriet Cohen-Supple <oriet@wrightandsupple.com>  
**Subject:** RE: Moorjani matter -- a follow up question for you ...

Good Morning, Oriet –

I am not authorized to provide that information. Our clients, including Deepak's mother, do not wish for Deepak to know where she resides at this time.

Best,

**ZAG S. BASSIRIAN**  
ASSOCIATE  
PROCOPIO

P. 619.906.5759 | F. 619.744.5478 | [zag.bassirian@procopio.com](mailto:zag.bassirian@procopio.com)  
525 B STREET, SUITE 2200, SAN DIEGO, CA 92101  
[View Profile](#) | [LinkedIn](#) | [procopio.com](http://procopio.com)

---

**From:** Oriet Cohen-Supple <oriet@wrightandsupple.com>  
**Sent:** Wednesday, October 13, 2021 8:21 AM  
**To:** Bassirian, Zagros S. <zag.bassirian@procopio.com>  
**Subject:** RE: Moorjani matter -- a follow up question for you ...

**\* EXTERNAL EMAIL - Please use Caution. \***

Good morning

Can you please confirm whether the mother is now back in California and living with Deepak's brother and his wife? Or if not, where is she living?

Thanks,

**Warm Regards,**  
**Oriet Cohen-Supple**  
Partner





FW: Moorjani matter -- a follow up question for you ...

2 Attachments, 9 KB

---

**From:** Bassirian, Zagros S. <zag.bassirian@procopio.com>  
**Sent:** Wednesday, October 13, 2021 10:35 AM  
**To:** Oriet Cohen-Supple <oriet@wrightandsupple.com>  
**Cc:** Mary Wright <mary@wrightandsupple.com>  
**Subject:** RE: Moorjani matter -- a follow up question for you ...

Oriet –

The reason why you received the response you did is a product of Deepak's own doing. His consistent harassment of Zubie, family, and friends over the last decade has left everyone feeling deeply concerned and emotionally distressed about what he might do next. Our clients will not sit back and continue to suffer any longer. For example, in 2014, Deepak sent a package to his mother demanding she sign a power of attorney in his favor, and threatened to file a court action alleging her incompetence with a goal of appointing him as her legal guardian. Zubie's attorney in Ohio sent him an e-mail stating Zubie told him Deepak had been very aggressive towards her to the point of being not only insulting, but abusive and overbearing. Mr. Jacobs relayed Zubie's wish that Deepak was not welcome at her home, the locks were changed, and should he attempt to enter the premises the police would be called. That directive remains, and should Deepak (directly or indirectly) attempt to visit our clients for any reason, we will seek a civil harassment restraining order against him immediately due to his continued course of conduct to harass our clients.

No undue influence is being exerted over Zubie, and her physician has once again recently certified that she is competent to handle her affairs. The bottom line is Deepak must stay away. If he insists on proceeding with his meritless lawsuit and/or threatened elder abuse claims, which is based on nothing more than rank conjecture, our clients will vigorously defend them and use any and all means available to seek recourse from the Court. I would encourage you to fully vet claims he may wish to file before actually doing so.

Notwithstanding the above, and if your client agrees to drop his claims, our clients are willing to provide the physician's finding of competence and a notarized statement from Zubie declaring her wish that she does not want Deepak to be a part of her life, and that he should cease attempting to contact her.

Best,

**ZAG S. BASSIRIAN**  
ASSOCIATE  
PROCOPIO

P. 619.906.5759 | F. 619.744.5478 | [zag.bassirian@procopio.com](mailto:zag.bassirian@procopio.com)  
525 B STREET, SUITE 2200, SAN DIEGO, CA 92101  
[View Profile](#) | [LinkedIn](#) | [procopio.com](http://procopio.com)

---

**From:** Oriet Cohen-Supple <oriet@wrightandsupple.com>  
**Sent:** Wednesday, October 13, 2021 8:59 AM  
**To:** Bassirian, Zagros S. <zag.bassirian@procopio.com>  
**Cc:** Mary Wright <mary@wrightandsupple.com>  
**Subject:** RE: Moorjani matter -- a follow up question for you ...

Oriet Cohen-Supple <[REDACTED]>  
Resent-From: [REDACTED]  
To: Deepak Moorjani <[REDACTED]>  
Fwd: Moorjani: Confirmation of Extension (October 18, 2021)

November 30, 2021 1:15 PM

[REDACTED]  
[REDACTED]

Oriet Cohen-Supple, Partner  
Cell: 1-510-495-5749

Begin forwarded message:

**From:** "Bassirian, Zagros S." <[REDACTED]>  
**Date:** November 30, 2021 at 1:03:34 PM PST  
**To:** Oriet Cohen-Supple <[REDACTED]>  
**Cc:** "Turpin, Melissa Avitia" <Melissa.Turpin@procopio.com>, "Alessio, John D." <john.alessio@procopio.com>, Mary Wright <mary@wrightandsupple.com>  
**Subject:** RE: Moorjani: Confirmation of Extension (October 18, 2021)

Oriet –

Hope all is well. We did not receive the proposal you mentioned in October, and while I see the FAC was filed on 11/22, we were not served with a copy. Please let us know the status of this case and whether you intend to serve the FAC. Thank you.

Best,

**ZAG S. BASSIRIAN**  
ASSOCIATE  
PROCOPIO

P. 619.906.5759 | F. 619.744.5478 | zag.bassirian@procopio.com  
525 B STREET, SUITE 2200, SAN DIEGO, CA 92101  
[View Profile](#) | [LinkedIn](#) | [procopio.com](#)

---

**From:** Oriet Cohen-Supple <oriet@wrightandsupple.com>  
**Sent:** Thursday, October 21, 2021 9:14 AM  
**To:** Bassirian, Zagros S. <zag.bassirian@procopio.com>  
**Cc:** Turpin, Melissa Avitia <Melissa.Turpin@procopio.com>; Alessio, John D. <john.alessio@procopio.com>; Mary Wright <mary@wrightandsupple.com>  
**Subject:** Re: Moorjani: Confirmation of Extension (October 18, 2021)

**\* EXTERNAL EMAIL - Please use Caution. \***

As to a proposal, I will reach out next week via email. Stay tuned.

Oriet Cohen-Supple, Partner  
Cell: 1-510-495-5749

On Oct 21, 2021, at 9:12 AM, Bassirian, Zagros S. <zag.bassirian@procopio.com> wrote:

Good Morning, Oriet –

Understood. Please confirm our clients need not respond to the complaint and your client will not seek a default in the interim.

On resolution, I believe you were going to make a proposal. Please do that under separate cover.

Oriet Cohen-Supple <[oriet@wrightandsupple.com](mailto:oriet@wrightandsupple.com)>  
Re: RE: Moorjani: Confirmation of Extension (October 18, 2021)  
To: Deepak Moorjani <[deepak@moorjani.com](mailto:deepak@moorjani.com)>  
FW: Moorjani: Confirmation of Extension (October 18, 2021)

December 7, 2021 3:16 PM

-----

**From:** Oriet Cohen-Supple <[oriet@wrightandsupple.com](mailto:oriet@wrightandsupple.com)>  
**Sent:** Tuesday, December 7, 2021 3:16 PM  
**To:** Bassirian, Zagros S. <[zag.bassirian@procopio.com](mailto:zag.bassirian@procopio.com)>  
**Cc:** Turpin, Melissa Avitia <[Melissa.Turpin@procopio.com](mailto:Melissa.Turpin@procopio.com)>; Alessio, John D. <[john.alessio@procopio.com](mailto:john.alessio@procopio.com)>; Mary Wright <[mary@wrightandsupple.com](mailto:mary@wrightandsupple.com)>  
**Subject:** RE: Moorjani: Confirmation of Extension (October 18, 2021)

The client is in the process of transitioning to a new counsel. Either the client or the new counsel will contact you soon.

**From:** Bassirian, Zagros S. <[zag.bassirian@procopio.com](mailto:zag.bassirian@procopio.com)>  
**Sent:** Tuesday, December 7, 2021 3:12 PM  
**To:** Oriet Cohen-Supple <[oriet@wrightandsupple.com](mailto:oriet@wrightandsupple.com)>  
**Cc:** Turpin, Melissa Avitia <[Melissa.Turpin@procopio.com](mailto:Melissa.Turpin@procopio.com)>; Alessio, John D. <[john.alessio@procopio.com](mailto:john.alessio@procopio.com)>; Mary Wright <[mary@wrightandsupple.com](mailto:mary@wrightandsupple.com)>  
**Subject:** RE: Moorjani: Confirmation of Extension (October 18, 2021)

Oriet –

I received a copy of the amended complaint in the mail and it was filed in pro per. Are you no longer representing Deepak?

Best,

**ZAG S. BASSIRIAN**  
ASSOCIATE  
PROCOPIO

P. 619.906.5759 | F. 619.744.5478 | [zag.bassirian@procopio.com](mailto:zag.bassirian@procopio.com)  
525 B STREET, SUITE 2200, SAN DIEGO, CA 92101  
[View Profile](#) | [LinkedIn](#) | [procopio.com](http://procopio.com)

**From:** Bassirian, Zagros S.  
**Sent:** Tuesday, November 30, 2021 1:03 PM  
**To:** 'Oriet Cohen-Supple' <[oriet@wrightandsupple.com](mailto:oriet@wrightandsupple.com)>  
**Cc:** Turpin, Melissa Avitia <[Melissa.Turpin@procopio.com](mailto:Melissa.Turpin@procopio.com)>; Alessio, John D. <[john.alessio@procopio.com](mailto:john.alessio@procopio.com)>; Mary Wright <[mary@wrightandsupple.com](mailto:mary@wrightandsupple.com)>  
**Subject:** RE: Moorjani: Confirmation of Extension (October 18, 2021)

Oriet –

Hope all is well. We did not receive the proposal you mentioned in October, and while I see the FAC was filed on 11/22, we were not served with a copy. Please let us know the status of this case and whether you intend to serve the FAC. Thank you.

Best,

**ZAG S. BASSIRIAN**  
ASSOCIATE  
PROCOPIO

P. 619.906.5759 | F. 619.744.5478 | [zag.bassirian@procopio.com](mailto:zag.bassirian@procopio.com)  
525 B STREET, SUITE 2200, SAN DIEGO, CA 92101  
[View Profile](#) | [LinkedIn](#) | [procopio.com](http://procopio.com)

**From:** Oriet Cohen-Supple <[oriet@wrightandsupple.com](mailto:oriet@wrightandsupple.com)>  
**Sent:** Thursday, October 21, 2021 9:14 AM  
**To:** Bassirian, Zagros S. <[zag.bassirian@procopio.com](mailto:zag.bassirian@procopio.com)>  
**Cc:** Turpin, Melissa Avitia <[Melissa.Turpin@procopio.com](mailto:Melissa.Turpin@procopio.com)>; Alessio, John D. <[john.alessio@procopio.com](mailto:john.alessio@procopio.com)>; Mary Wright <[mary@wrightandsupple.com](mailto:mary@wrightandsupple.com)>  
**Subject:** Re: Moorjani: Confirmation of Extension (October 18, 2021)

## Event Report

Event ID: 2023-024092

Call Ref #: 931

Date/Time Received: 03/06/23 13:00:57

Rpt #:	Call Source: PHONE	Prime 152 Unit: WHITMORE, TRAVIS M	Services Involved			
			LAW			
Location: 500 RIVERSIDE DR						
X-ST: EAGLE POINT DR			Jur: WCS Service: LAW Agency: ROSS			
EAGLE POINT DR			St/Beat: ROSS District: NRTH		RA: 620	
Business:			Phone: ( ) -		GP: ROSS	
Nature: SUSPICIOUS INCIDENT		Alarm Lvl: 1	Priority: 2	Medical Priority:		
Caller: MOORJANI,DEEPAK			Alarm:			
Addr: 500 RIVERSIDE DR			Phone: (508) 704-1111		Alarm Type:	
Vehicle #:	St:	Report Only: No	Race:	Sex:	Age:	
Call Taker: NVAUGHAN			Console: 5004			
Geo-Verified Addr.: Yes		Nature Summary Code:	Disposition: COMP	Close Comments:		
<p>Notes: CONTACTED 173 AND ADVISED THAT THE INCIDENT OCCURRED BETWEEN 1970 AND 1998 [03/10/23 12:16:43 JVARGAS]</p> <p>SPOKE WITH CALLER AND HE ADVISED HE WANTED A REPORT REGARDING DOMESTIC VIOLENCE FOR 1970-1990. CALLER STATED FATHER USED TO BEAT MOTHER. CALLER ADVISED HE IS CURRENTLY TRYING TO REPORT ELDER ABUSE FOR HIS MOTHER SINCE HIS BROTHER WONT LET HER LIVE IN HER HOUSE IN CALIFORNIA. CALLER STATED HE WANTED A REPORT TO SHOW A PATTERN OF ABUSE. CALLER LIVES IN CALIFORNIA, MOTHER LIVES IN CALIFORNIA, AND FATHER LIVES IN FLORIDA. I ATTEMPTED TO CALL THE MOTHER AND DID NOT GET AN ANSWER. I THEN SPOKE WITH FATHER AND HE DENIED ALL ALLEGATIONS.</p> <p>NFI. [03/06/23 14:01:23 Unit:152]</p> <p>REPORTING DOMESTIC VIOLENCE BETWEEN MOTHER AND FATHER THAT HAPPENED IN THE 70s 80s AND 90s. CALLER AND MOTHER ARE IN DIFFERENT CITIES IN CALIFORNIA. FATHER IS IN FLORIDA. SEEKING REPORT AT THE ADVICE OF LEGAL COUNSEL FOR A PROTECTIVE ORDER. [03/06/23 13:04:55 NVAUGHAN]</p>						

## Times

Call Received: 03/06/23 13:00:57	Time From-Call Received		
Call Routed: 03/06/23 13:04:55	000:03:58	Unit Reaction: : :	(1st Dispatch to 1st Arrive)
Call Take Finished: 03/06/23 13:04:55	000:03:58	En-Route: : :	(1st Dispatch to 1st En-Route)
1st Dispatch: 03/06/23 13:06:18	000:05:21 (Time Held)	On-Scene: : :	(1st Arrive to Last Clear)
1st En-Route:	: :		
1st Arrive:	: :	(Reaction Time)	
Last Clear: 03/06/23 14:02:13	001:01:16		

## Radio Log

Unit	Empl ID	Type	Description	Time Stamp	Comments	Close Code	User
152	450914	D	Dispatched	03/06/23 13:06:18	Stat/Beat: ROSS		NVAUG
152	450914	C	Cleared	03/06/23 14:02:13	COMP [COMP]	COMP	JVARGA

## Event Log

Unit	Empl ID	Type	Description	Time Stamp	Comments	Close Code	User
		TR	Time Received	03/06/23 13:00:57	By: PHONE		NVAUG
		ENT	Entered Street	03/06/23 13:01:18	500 RIVERSIDE DR		NVAUG

Unit	Empl ID	Type	Description	Time Stamp	Event Log	Close Code	User
					Comments		
		ENT	Entered	03/06/23 13:01:36	MOORJANI,TEEPAK		NVAUG
		ENT	Entered CallerPhone	03/06/23 13:01:44	MOORJANI,TEEPAK		NVAUG
		ENT	Entered Nature	03/06/23 13:01:50	DOMESTIC VIOLENCE		NVAUG
		CHG	Changed Nature	03/06/23 13:02:09	DOMESTIC VIOLENCE --> CIVIL		NVAUG
		VCH	Viewed Call History	03/06/23 13:03:07	Location Information		NVAUG
		ENT	Entered Remarks	03/06/23 13:04:55			NVAUG
		FIN	Finished Call Taking	03/06/23 13:04:55			NVAUG
		CHG	Changed Nature	03/06/23 13:05:29	CIVIL DISPUTE / COMPLAINT -->		NVAUG
		VEV	Viewed Event	03/06/23 13:06:13	User First Viewed Event CAD		JFLAGE
		VEV	Viewed Event	03/06/23 13:07:10	User First Viewed Event CAD		SSHAWV
		ARM	Added Remarks	03/06/23 14:01:23			Unit:152
		CHG	Changed	03/10/23 12:15:48	MOORJANI,TEEPAK -->		JVARGA
		ARM	Added Remarks	03/10/23 12:16:43			JVARGA

*a memo from the desk of*  
***Deepak Moorjani***

*Monday, June 5, 2023*

Police Chief Danilynn Miller  
City of Sylvania  
6635 Maplewood Avenue  
Sylvania, Ohio 43560

to: Chief Danilynn Miller  
subject: via Tony Pizza (deceased): Police Report for Elder Abuse

Dear Chief Miller,

Greetings from San Francisco. My mom and I were former friends of Tony and Madlynn Pizza, and I would like to file a police report for elder abuse in Sylvania, Ohio. There is no police response required.

In 2013, the elder abuse documentation begins, and the elder abuse is continued and ongoing. In 2021, my mom moved from Sylvania to San Diego, and I will also be filing a report with the San Diego County Sheriff.

Trauma begets trauma, and my mom is not able to advocate for herself. I believe that Prosecutor Tony Pizza would have pursued these elder abuse cases, and I hope that Prosecutor Julia Bates will file Protective Orders against Sueja Kummer (S.K. Financial) and Frank Jacobs (Eastman & Smith) on behalf of my mom.

The logical reasoning is presented in the section titled "Supplementary Notes to Prosecutor Julia Bates and Prosecutor Summer Stephan" at the following URL: <https://archive.org/details/20040103-deepak-moorjani-lucas-county-prosecutor-anthony-pizza>

In May 1998, Suzanne Stolar facilitated Dr. Zubie Moorjani's escape from her abusive relationship, and Dr. Zubie Moorjani moved into an emergency call room at Riverside Hospital for nine months. Concurrently, Anthony Pizza and Madlynn Pizza provided her with room and board at their home at 628 East Shoreline Drive, Holland, Ohio 43528. Subsequent to Anthony Pizza's passing, Madlynn Pizza moved into Dr. Zubie Moorjani's neighborhood (Quarrys Edge, Sylvania, Ohio) to maintain proximity.

Until 2004, my mom and I spent many Thanksgiving and Christmas holidays with Tony and Madlynn Pizza and their family. In 2004, I moved to Tokyo with Morgan Stanley's private equity investment operation. Tony Pizza was adamant in his refusal to use email, and this made long-distance communication difficult.

In March 2023, I reported my father for domestic violence with the Rossford Police Department. This domestic violence case did not require a police response; therefore, this cold case was booked as a civil case, and this case was filed as a CAD report (Rossford Police CAD report 2023-024092). This was facilitated by Officer Mark Skala (ret.), a friend and former classmate at St. John's High School.

*Deepak Moorjani,*



### **Elder Abuse suspects (2)**

1. Suoeja Kummar: 6029 Renaissance Place, Suite D Toledo, OH 43623. 419.885.7852 and skummar@sagepointadvisor.com
2. Frank Jacobs (Ohio Bar No. 11310). One SeaGate 24th Fl, Toledo, OH 43604-1576. 419-247-1719 and fdjacobs@eastmansmith.com

The elder abuse documentation is posted online and has been filed in San Diego Superior Court.

### **Primary Documentation (2)**

1. Anthony Pizza and Deepak Moorjani

<https://archive.org/details/20040103-deepak-moorjani-lucas-county-prosecutor-anthony-pizza>

2. Elder Abuse Petition, Motion to Disqualify

<https://archive.org/details/20211207-frank-jacobs-bar-11310-john-alessio-bar-174900-elder-abuse-motion-disqualify>

### **Secondary Documentation (2)**

3. Suoeja Kummar (CRD #2295191)

<https://archive.org/details/20210831-suoeja-kummar-crd-2295191-frank-jacobs-bar-11310-john-alessio-bar-174900>

4. Elder Abuse Petition

<https://archive.org/details/20211122-frank-jacobs-bar-11310-john-alessio-bar-174900-elder-abuse-petition>

Please contact me with any questions. Thank you for your kind attention.

Deepak

cc: Julia Bates, Lucas County Prosecutor

cc: Summer Stephan, San Diego County District Attorney

*Deepak Moorjani ,*

**Supplementary documentation:** Eight of the following ten voicemails were recorded while my mom lived at Quarrys Edge in Sylvania, Ohio.

- 1. Dr. Zubie Moorjani December 06, 2018 voicemail

<https://archive.org/download/20040103-deepak-moorjani-lucas-county-prosecutor-anthony-pizza/20181206-Lucas-County-Prosecutor-Anthony-Pizza-Zubie-Moorjani.mp3>

- 2. Dr. Zubie Moorjani December 24, 2018 voicemail, part 1

<https://archive.org/download/20040103-deepak-moorjani-lucas-county-prosecutor-anthony-pizza/201812241307-Lucas-County-Prosecutor-Anthony-Pizza-Zubie-Moorjani.mp3>

- 3. Dr. Zubie Moorjani December 24, 2018 voicemail, part 2

<https://archive.org/download/20040103-deepak-moorjani-lucas-county-prosecutor-anthony-pizza/201812241312-Lucas-County-Prosecutor-Anthony-Pizza-Zubie-Moorjani.mp3>

- 4. Dr. Zubie Moorjani May 18, 2021 voicemail, part 1

<https://archive.org/download/20040103-deepak-moorjani-lucas-county-prosecutor-anthony-pizza/20210518155725-Lucas-County-Prosecutor-Anthony-Pizza-Zubie-Moorjani.m4a>

- 5. Dr. Zubie Moorjani May 18, 2021 voicemail, part 2

<https://archive.org/download/20040103-deepak-moorjani-lucas-county-prosecutor-anthony-pizza/20210518161208-Lucas-County-Prosecutor-Anthony-Pizza-Zubie-Moorjani.m4a>

- 6. Dr. Zubie Moorjani May 25, 2021 voicemail, part 1

<https://archive.org/download/20040103-deepak-moorjani-lucas-county-prosecutor-anthony-pizza/20210525084530-Lucas-County-Prosecutor-Anthony-Pizza-Zubie-Moorjani.m4a>

- 7. Dr. Zubie Moorjani May 25, 2021 voicemail, part 2

<https://archive.org/download/20040103-deepak-moorjani-lucas-county-prosecutor-anthony-pizza/20210525084550-Lucas-County-Prosecutor-Anthony-Pizza-Zubie-Moorjani.m4a>

- 8. Adult Protective Services, Lucas County May 27, 2021 voicemail

<https://archive.org/download/20040103-deepak-moorjani-lucas-county-prosecutor-anthony-pizza/20210527-Lucas-County-Prosecutor-Anthony-Pizza-Zubie-Moorjani-Adult-Protective-Services.mp3>

- 9. San Diego Superior Court December 27, 2021 voicemail

<https://archive.org/download/20040103-deepak-moorjani-lucas-county-prosecutor-anthony-pizza/20211227-Lucas-County-Prosecutor-Anthony-Pizza-Zubie-Moorjani-elder-abuse-motion-disqualify.mp3>

- 10. Adult Protective Services, San Diego County February 08 2022 voicemail

<https://archive.org/download/20040103-deepak-moorjani-lucas-county-prosecutor-anthony-pizza/20220208-Lucas-County-Prosecutor-Anthony-Pizza-Zubie-Moorjani-Adult-Protective-Services.mp3>

.....